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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re

68 BURNS NEW HOLDINGS, INC  
  
Debtor.

Case No: 24-45157-nh  
Chapter 11

**NOTICE OF  
APPEARANCE**

**PLEASE TAKE NOTICE** that the LAW OFFICE JULIO E. PORTILLA, P.C., appears as attorneys for 68 BURNS NEW HOLDINGS, INC. (the “Debtor”) and hereby requests notice of all events relevant to the above-referenced case, including all pleadings or documents filed in relation to any requests for hearings, objections, and/or notices of motion, or any other auxiliary filing, as well as notice of all matters which must be noticed to creditors, creditors committee and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced Bankruptcy Court.

The LAW OFFICE OF JULIO E. PORTILLA, P.C. requests that for all notice purposes and for inclusion in the master mailing list in this case, the following address be used:

LAW OFFICE OF JULIO E. PORTILLA, P.C.  
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Neither this request nor any subsequent appearance, pleading, claim proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party:

a. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto notwithstanding the designation or not of such matters as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;

b. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary or discretionary withdrawal; and

c. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved by this party without exception and with no purpose of confession or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: January 8, 2025  
New York, NY

Respectfully submitted,

**LAW OFFICE OF JULIO E. PORTILLA, P.C.**

/s/ Julio E. Portilla  
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